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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALIREZA ZARE, Derivatively on Behalf of
IDEANOMICS, INC.,

Plaintiff,

v.

ZHENG WU, SHANE McMAHON, ALFRED
POOR, YANG CHAO, JAMES S. CASSANO,
STEVEN FADEM, HARRY EDELSON,
JERRY FAN, and JOHN WALLACE,

Defendants,

and,

IDEANOMICS, INC., a Nevada corporation,

Nominal Defendant.

Case No. 3:20-CV-00608-MMD-WGC

**STIPULATION, REQUEST AND
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

Action Filed: October 27, 2020

Plaintiff Alireza Zare (“Plaintiff”) and nominal defendant Ideanomics, Inc. (the “Company”), and defendants Zheng Wu, Shane McMahon, Alfred Poor, Yang Chao, James S. Cassano, Harry Edelson, Steven Fadem, Harry Edelson, Jerry Fan, and John Wallace, (collectively, the “Individual Defendants,” and together with the Company, “Defendants”), through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed his Complaint on October 27, 2020 (Dkt. No. 1);

WHEREAS, Plaintiff served Defendants with its Complaint and Summons on November 3, 2020 (Dkt. No. 5);

WHEREAS, Defendants’ response is currently due on November 24, 2020;

WHEREAS, the Parties have agreed to extend Defendants’ time to answer or otherwise respond to the Complaint to December 8, 2020;

WHEREAS, this is the first extension of time for Defendants;

WHEREAS, this enlargement of Defendants’ time to answer or otherwise respond to the Complaint will not alter the date of any event or deadline already fixed by Court order;

IT IS HEREBY STIPULATED AND AGREED by the parties and their undersigned counsel that the time for Defendants to answer or otherwise respond to the Complaint is extended to December 8, 2020.

Dated: November 23, 2020

VENABLE LLP

By: /s/ John S. Worden
 JOHN S. WORDEN
Attorneys for Defendants

Dated: November 23, 2020

MATTHEW L. SHARP, LTD.

By: /s/ Matthew L. Sharp
 MATTHEW L. SHARP
Attorneys for Plaintiff

IT IS SO ORDERED:

DATED: November 24, 2020

William G. Cobb
 UNITED STATES MAGISTRATE JUDGE